

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

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SUHAIL NAJIM	)	
ABDULLAH AL SHIMARI <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	Case No. 1:08-cv-827 (LMB/JFA)
v.	)	
	)	
CACI PREMIER TECHNOLOGY, INC.	)	
	)	
Defendant.	)	
	)	
	)	

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**PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(3) DISCLOSURES**

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, Plaintiffs Suhail Najim Abdulla Al Shimari, Asa’ad Hamzah Hanfoosh Al-Zuba’e, and Salah Hasan Nsaif Jasim Al-Ejaili (collectively, “Plaintiffs”), by and through their undersigned counsel, respectfully submit the following supplemental Rule 26(a)(3) disclosures. These disclosures are made without waiver of the attorney-client privilege, attorney work-product doctrine, or any other applicable privilege. Plaintiffs reserve the right to add to or amend these disclosures as appropriate and/or necessary.

**PLAINTIFFS' SUPPLEMENTAL TRIAL EXHIBITS**

Trial Ex. # (PTX)	Bates/Dep. Ex. Number	Description
85A	Porvaznik Dep. Ex. 6	CACI Year 2003 Code of Ethics and Business Conduct Standards <sup>1</sup>
229	CACI 4760	Certification of Understanding and Compliance with Code of Ethics and Business Conduct Standards and Electronic Communications Policy executed by Torin Nelson <sup>2</sup>
230	CACI 11992 - 11995	Employment Agreement between CACI Premier Technology, Inc. and Torin Nelson <sup>3</sup>
231	Army 0010503	Photograph of Sabrina Harman <sup>4</sup>
232	Army 0010417 - 0010419	October 20, 2003 Letter from Sabrina Harman to Kelly <sup>5</sup>
233	Army 0000906 - 0000908	December 15, 2003 Letter from Sabrina Harman to Kelly <sup>6</sup>
234	Army 0010371	Photograph of Sabrina Harman taking pictures of detainees. <sup>7</sup>

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<sup>1</sup> CACI's 2004 Code of Conduct, which is nearly identical to PTX-85A, is identified as PTX-85 and was admitted at the April 2024 trial.

<sup>2</sup> This document comes from CACI's own files and bears significantly on CACI's borrowed servant defense.

<sup>3</sup> This document comes from CACI's own files and bears significantly on CACI's borrowed servant defense.

<sup>4</sup> Plaintiffs intend to use this photograph as a demonstrative only.

<sup>5</sup> On October 23, 2024, the Government granted a *Touhy* request from CACI seeking, among other things, authorization for "any and all public statements, including private statements that have become public (such as published letters), regarding Ms. Harman's experiences at Abu Ghraib" and "all pictures in which Ms. Harman is featured or for which Ms. Harman was the photographer. See ECF No. 1762-6 at 4.

<sup>6</sup> On October 23, 2024, the Government granted a *Touhy* request from CACI seeking, among other things, authorization for "any and all public statements, including private statements that have become public (such as published letters), regarding Ms. Harman's experiences at Abu Ghraib" and "all pictures in which Ms. Harman is featured or for which Ms. Harman was the photographer. See ECF No. 1762-6 at 4. Plaintiffs will redact portions of PTX 233 the content of which is inadmissible under the Court's prior rulings.

<sup>7</sup> On October 23, 2024, the Government granted a *Touhy* request from CACI seeking, among other things, authorization for "any and all public statements, including private statements that have become public (such as published letters), regarding Ms. Harman's experiences at Abu Ghraib" and "all pictures in which Ms. Harman is featured or for which Ms. Harman was the photographer. See ECF No. 1762-6 at 4.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2024, I electronically filed the foregoing through the CM/ECF system, which sends notification to counsel for Defendants.

/s/ Charles B. Molster, III

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